

FILED IN OPEN COURT
ON 5-27-2020 *BC*
Peter A. Moore, Jr., Clerk
US District Court
Eastern District of NC
LINA

NO. 7:20-CR-103-1M(4)

The Grand Jury charges that:

On or about January 14, 2020, in the Eastern District of North Carolina, the defendant, QUADARRIUS COTTEN, also known as "Reckless," did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

On or about January 22, 2020, in the Eastern District of North Carolina, the defendant, QUADARRIUS COTTEN, also known as "Reckless," did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

On or about January 28, 2020, in the Eastern District of North Carolina, the defendant, QUADARRIUS COTTEN, also known as "Reckless," did knowingly and

intentionally distribute a quantity of cocaine, a Schedule II controlled substance, and a quantity of Fentanyl, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

On or about January 28, 2020, in the Eastern District of North Carolina, the defendant, QUADARRIUS COTTEN, also known as "Reckless," knowingly possessed a firearm during and in relation to a trafficking crime for which he may be prosecuted in a court of the United States, as alleged in Count Three of this Indictment, and did possess said firearm in furtherance of said drug trafficking crime, in violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT FIVE

On or about January 28, 2020, in the Eastern District of North Carolina, the defendant, QUADARRIUS COTTEN, also known as "Reckless," knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one (1) year, knowingly possessed a firearm, and the firearm was in and affecting commerce in violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT SIX

On or about May 16, 2020, in the Eastern District of North Carolina, the defendant, QUADARRIUS COTTEN, also known as "Reckless," did knowingly and

intentionally possess with the intent to distribute a quantity of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

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FORFEITURE NOTICE

Notice is hereby given that all right, title and interest in the property described herein is subject to forfeiture.

Upon conviction of any felony violation of the Controlled Substances Act charged herein, the defendant shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a), any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the said offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said offense.

Upon conviction of any violation of the Gun Control Act, the National Firearms Act, or any other offense charged herein that involved or was perpetrated in whole or in part by the use of firearms or ammunition, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and/or 26 U.S.C. § 5872, as made applicable by 28 U.S.C. § 2461(c), any and all firearms and ammunition that were involved in or used in a knowing or willful commission of the offense, or, pursuant to 18 U.S.C. § 3665, that were found in the possession or under the immediate control of the defendant at the time of arrest.

The forfeitable property includes, but is not limited to, the following:

Forfeiture Money Judgment:

- a) A sum of money representing the gross proceeds of the offense(s) charged herein against QUADARRIUS COTTEN, also known as "Reckless," in the amount of at least \$1,500.

If any of the above-described forfeitable property, as a result of any act or omission of a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:

REDACTED VERSION

Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

FOREPERSON

DATE: 5-27-20

ROBERT J. HIGDON, Jr.
United States Attorney

TSEVERO
BY: TIMOTHY M. SEVERO
Assistant United States Attorney